

STATEMENT OF BASIS (AI No. 149246)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122891 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: RCS, LLC
RCS Port Fourchon
P.O. Box 3091
Houma, LA 70361-3091

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: April 11, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: N/A
LPDES permit expiration date: N/A

C. Date Application Received: March 7, 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - an oilfield service facility

Pressurized water/solvent/surfactant washing of marine vessels and equipment previously containing exploration and production drilling fluids. The rinsate is transferred into a closed-loop system where solids and oils are separated. Rinse water is reused until operation determines unusable, then it is routed to the discharge filtration system.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: III (BPJ points to 10)
3. Wastewater Type: II
4. SIC code: 1389

C. LOCATION - 1 N. Doucet Drive in Port Fourchon, Lafourche Parish
Latitude 29°08'37", Longitude 90°12'51"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: oilfield marine vessel/equipment washwater
Treatment: gravitational settling tanks for solids/oil separation;
solids/carbon filtration system
Location: at the point of discharge from the filtration system
(Latitude 29°08'37", Longitude 90°12'53")
Flow: 25,000 gpd
Discharge Route: unnamed channel, thence into Bayou Lafourche

4. RECEIVING WATERS

STREAM - unnamed channel, thence into Bayou Lafourche

BASIN AND SEGMENT - The discharge is into an unnamed channel, which is physically located in subsegment 020905 of the Barataria Basin, defined at LAC 33:IX.1123.Table 3 as Bayou Moreau (Estuarine). However, the discharge from RCS Port Fourchon does not flow into this defined waterbody, rather into subsegment 020403, defined at LAC 33:IX.1123.Table 3 as Bayou Lafourche - Yankee Canal and Saltwater Barrier to Gulf of Mexico. Therefore, for purposes of issuing this permit, subsegment 020403 will be used in the development of requirements.

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation*

*Oyster Propagation is listed as a designated use of Segment 020403 (Bayou Lafourche - Yankee Canal and Saltwater Barrier to Gulf of Mexico). However, this designated use is applicable only if the discharge is directly into the named waterbody and not into a tributary or distributary of the waterbody, per LAC33:IX.1111.E.

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of compliance actions were found.

B. DMR Review/Excursions

No DMR data were available for review since this is a first time issuance.

7. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020403 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

11. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain and LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

Rationale for RCS, LLC

1. **Outfall 001** oilfield marine vessel/equipment washwater (estimated flow is 0.025 MGD)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow-MGD	Report:Report	LAC 33:IX.2707.I.1.B
BOD5	22:61	40 CFR Part 442.34
TSS	26:58	40 CFR Part 442.34
Oil and Grease	16:36	40 CFR Part 442.34
Cadmium	--:0.02	40 CFR Part 442.34
Chromium	--:0.42	40 CFR Part 442.34
Copper	--:0.10	40 CFR Part 442.34
Lead	--:0.14	40 CFR Part 442.34
Mercury	--:0.0013	40 CFR Part 442.34
Nickel	--:0.58	40 CFR Part 442.34
Zinc	--:8.3	40 CFR Part 442.34
Oil&Grease,Visual	No Presence	BPJ - Similar Discharges*
Soaps/Detergents	Report	BPJ - Similar Discharges*
pH (su)	6.0-9.0 (min) (max)	40 CFR Part 442.34

Treatment: gravitational settling tanks for solids/oil separation; solids/carbon filtration system

Monitoring Frequency: Flow shall be estimated once per month. Grab samples shall be collected once per month for analysis of BOD5, TSS, Oil and Grease, Soaps/Detergents, and pH. Observation once per day to determine presence or absence of Oil & Grease-Visual. Grab samples shall be collected once per quarter for analysis of Cadmium, Chromium, Copper, Lead, Mercury, Nickel, and Zinc.

Limits Justification: Effluent Limitations Guidelines (40 CFR Part 442, Subpart C - Tank Barges and Ocean/Sea Tankers Transporting Chemical and Petroleum Cargos)
NOTE: Residual hauled fluids known as "heels" are not authorized to be discharged through this outfall. The "heels" are subject to the no discharge requirement for drilling fluids as addressed in the effluent guidelines and standards for the Coastal Subcategory of the Oil & Gas Extraction Point Source Category (40 CFR 435).

* Existing permits for similar outfalls
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

TMDL Waterbodies

Subsegment 020403, Bayou Lafourche - Yankee Canal and Saltwater Barrier to Gulf of Mexico, is listed on LDEQ's Final 2004 303(d) List as impaired for fecal coliform. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Barataria Basin, those suspected causes for impairment which are not directly attributed to the oilfield service company point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Fecal coliforms can not be attributed to the discharge of marine vessel/equipment washwater and industrial stormwater. Therefore this discharge should have no adverse impact on the existing uses of the receiving waterbody nor should it cause or contribute to the violation of state water quality standards.